

EXHIBIT L

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

-----:
RICHARD KADREY, et al., :
Individual and :
Representative Plaintiffs, :
vs. : Case No.:
META PLATFORMS, INC., : 3:23-cv-03417-VC
a Delaware corporation; :
Defendant. :
-----:

VIDEOTAPED DEPOSITION OF MATTHEW C. KLAM
Cleary Gottlieb Steen & Hamilton, LLP
Tuesday, December 10, 2024
9:40 a.m.

Reported by:
Robert M. Jakupciak, RPR
JOB No. SF-7030273

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1 And then on the output part it is 10:01:11
2 doing something that in my mind sounds like 10:01:21
3 auto-complete on steroids. It receives prompts 10:01:24
4 for a story in the style of author Matthew 10:01:30
5 Klam, a short story, or, you know, I don't know 10:01:35
6 how many prompts fit in that prompt box, but if 10:01:40
7 there are more prompts, it tries to do more 10:01:43
8 things to accommodate that prompt. 10:01:46

9 Q. Have you ever used any AI model 10:01:53
10 created by Meta? 10:01:57

11 A. Yeah. In the last couple days I 10:01:59
12 was playing around with it. 10:02:01

13 Q. We haven't seen any documents 10:02:07
14 reflecting this use, and so this would be 10:02:08
15 responsive to our document requests and so I 10:02:15
16 would ask that those be produced as soon as 10:02:17
17 possible. 10:02:20

18 A. I wasn't signed in to anything. I 10:02:20
19 was just on the website. It doesn't record 10:02:22
20 anything as far as I can tell. 10:02:26

21 Q. Did it you print anything? 10:02:28

22 A. No. I can tell you about it. If 10:02:29

REPORTER'S CERTIFICATE

I, ROBERT M. JAKUPCIAK, an RPR and
Notary Public within and for the District of
Columbia do hereby certify:

That the witness whose deposition is
hereinbefore set forth, was duly sworn and that
the within transcript is a true record of the
testimony given by such witness.

I further certify that I am not
related to any of these parties to this action
by blood or marriage and that I am in no way
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 20th day of December, 2024.



ROBERT M. JAKUPCIAK, an RPR and
Notary Public

My Commission Expires:
February 28, 2029

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Case No. 4:23-cv-04663

**PLAINTIFF TA-NEHISI COATES'S
RESPONSES TO DEFENDANT META
PLATFORMS, INC.'S SECOND SET OF
REQUESTS FOR ADMISSION**

1 Admit that YOU are personally unaware of any documentary evidence demonstrating that any
2 PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR
3 ASSERTED WORKS.

4 **RESPONSE TO REQUEST NO. 23:**

5 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
7 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the
8 terms “You” and “Your” as referring to Plaintiff Ta-Nehisi Coates. Plaintiff also objects to the term
9 “documentary evidence” as being vague and overbroad because it is not limited to the specific claims
10 and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware”
11 as unintelligible. Plaintiff, in him individual capacity, responds, admit.

12 **REQUEST FOR ADMISSION NO. 24:**

13 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models
14 that infringes YOUR ASSERTED WORKS.

15 **RESPONSE TO REQUEST NO. 24:**

16 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
17 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
18 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the
19 terms “You” and “Your” as referring to Plaintiff Ta-Nehisi Coates. Plaintiff objects to the phrase
20 “personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds, admit.

21 **REQUEST FOR ADMISSION NO. 25:**

22 Admit that YOU have personally used one of Meta’s Llama models.

23 **RESPONSE TO REQUEST NO. 25:**

24 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
25 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
26 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the
27 phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not
28

1 relevant to any claims or defenses in this dispute since this case concerns Meta’s large language
2 models. Plaintiff, in him individual capacity, responds, deny.

3 **REQUEST FOR ADMISSION NO. 26:**

4 Admit that YOU have personally used one of the ChatGPT large language models.

5 **RESPONSE TO REQUEST NO. 26:**

6 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
7 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
8 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the
9 terms “You” and “Your” as referring to Plaintiff Ta-Nehisi Coates. Plaintiff objects to the phrase
10 “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to
11 any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff,
12 in him individual capacity, responds, deny.

13 **REQUEST FOR ADMISSION NO. 27:**

14 Admit that each of YOUR ASSERTED WORKS have been made public.

15 **RESPONSE TO REQUEST NO. 27:**

16 Plaintiff objects to the defined term “Your” as vague and overbroad and calling for discovery
17 that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any
18 person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the term “Your” as
19 referring to Plaintiff Ta-Nehisi Coates. Plaintiff further objects to the phrase “made public” as vague
20 and misleading; that a work is available publicly does not mean that it is free to use without any
21 consideration. Plaintiff admits that him Asserted Works have been made available to the public through
22 various licensing agreements that made copies of the Asserted Works available for a price. Plaintiff
23 refers Meta to Plaintiff Silverman’s response to RFP 12.

24 **REQUEST FOR ADMISSION NO. 28:**

25 Admit that each of YOUR ASSERTED WORKS had been made public prior to the
26 infringement alleged in the COMPLAINT.

terms “You” and “Your” as referring to Plaintiff Ta-Nehisi Coates. Plaintiff further objects to the phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections, Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained by him is insufficient to enable him to admit or deny.

Dated: July 22, 2024

By: /s/ Bryan Clobes
Bryan L. Clobes

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Case No. 4:23-cv-04663

**PLAINTIFF JUNOT DIAZ'S RESPONSES
TO DEFENDANT META PLATFORMS,
INC.'S SECOND SET OF REQUESTS FOR
ADMISSION**

RESPONSE TO REQUEST NO. 23:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Junot Diaz. Plaintiff also objects to the term “documentary evidence” as being vague and overbroad because it is not limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds, admit.

REQUEST FOR ADMISSION NO. 24:

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

RESPONSE TO REQUEST NO. 24:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Junot Diaz. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds, admit.

REQUEST FOR ADMISSION NO. 25:

Admit that YOU have personally used one of Meta’s Llama models.

RESPONSE TO REQUEST NO. 25:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff, in him individual capacity, responds, deny.

REQUEST FOR ADMISSION NO. 26:

Admit that YOU have personally used one of the ChatGPT large language models.

1 Dated: July 22, 2024

By: /s/ Bryan Clobes
Bryan L. Clobes

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Christopher Farnsworth and
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,

Individual and Representative
Plaintiffs,

Case No. 3:23-cv-03417-VC

PLAINTIFF CHRISTOPHER
FARNSWORTH'S RESPONSES TO
DEFENDANT'S FIRST SET OF REQUESTS
FOR ADMISSIONS

PLAINTIFF CHRISTOPHER FARNSWORTH'S
RESPONSES TO RFA'S, SET 1
No. 3:23-CV-03417-VC

1 v.

2 META PLATFORMS, INC, a Delaware
3 corporation,

4 Defendant.

5
6
7 PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

8 RESPONDING PARTY: PLAINTIFF CHRISTOPHER FARNSWORTH

9 SET NO.: ONE
10

11 **INTRODUCTION**

12 Plaintiff Christopher Farnsworth (“Plaintiff”) hereby serves his responses and objections
13 to Defendant Meta Platforms, Inc.’s (“Defendant” or “Meta”) First Set of Requests for
14 Admissions (the “Requests” or “RFAs”).
15

16 **GENERAL OBJECTIONS**

17 1. Plaintiff generally objects to Defendant’s definitions and instructions to the extent
18 they purport to require Plaintiff to respond in any way beyond what is required by the Federal and
19 local rules.

20 2. Plaintiff objects to the Requests to the extent they seek information or materials
21 that are protected from disclosure by attorney-client privilege, the work product doctrine, expert
22 disclosure rules, or other applicable privileges and protections, including communications with
23 Plaintiff’s attorneys regarding the Action.

24 3. Discovery in this matter is ongoing and Plaintiff reserves the right to amend,
25 modify, or supplement these responses with subsequently discovered responsive information and
26 to introduce and rely upon any such subsequently discovered information in this litigation.
27
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that he will not admit or deny this Request, on the grounds that the information requested is not a proper subject of a Request for Admission. If a response is deemed required, Plaintiff denies the Request on this same basis. Plaintiff agrees to meet and confer on the appropriate vehicle for discovering Plaintiffs' current knowledge or awareness.

REQUEST FOR ADMISSION NO. 26:

Admit that YOU are personally unaware of any text generated by any of Meta's Llama models that infringes YOUR ASSERTED WORKS.

RESPONSE TO REQUEST FOR ADMISSION NO. 26:

Plaintiff objects that the term "personally unaware" is vague and ambiguous. Plaintiff objects to the extent that responding to this Request requires adopting a legal conclusion. Plaintiff further objects to this Request as an improper subject of a Request for Admission.

Subject to and without waiving these general and specific objections, Plaintiff responds that he will not admit or deny this Request, on the grounds that the information requested is not a proper subject of a Request for Admission. If a response is deemed required, Plaintiff denies the Request on this same basis. Plaintiff agrees to meet and confer on the appropriate vehicle for discovering Plaintiffs' current knowledge or awareness.

REQUEST FOR ADMISSION NO. 27:

Admit that YOU have personally used one of Meta's Llama models.

RESPONSE TO REQUEST FOR ADMISSION NO. 27:

Plaintiff objects that this Request is not relevant to any claims or defenses.

Subject to and without waiving these general and specific objections, Plaintiff denies Request No. 27.

REQUEST FOR ADMISSION NO. 28:

Admit that YOU have personally used one of the ChatGPT large language models.

RESPONSE TO REQUEST FOR ADMISSION NO. 28:

Plaintiff objects that this Request is not relevant to any claims or defenses.

Subject to and without waiving these general and specific objections, Plaintiff admits Request No. 28.

REQUEST FOR ADMISSION NO. 81:

Admit that you are not aware of any agreements to assign rights in or to YOUR ASSERTED WORK(S) that have not already been produced in this ACTION.

RESPONSE TO REQUEST FOR ADMISSION NO. 80:

Plaintiff objects that the terms “any agreements” and “assign rights in or to” are vague and ambiguous. Plaintiff further objects to this Request as compound and ambiguous, because it includes the disjunctive phrase, “in or to.” “[R]equests for admissions should not contain ‘compound, conjunctive, or disjunctive ... statements.’” *James v. Maguire Corr. Facility*, No. C 10-1795 SI PR, 2012 WL 3939343, at *4 (N.D. Cal. Sept. 10, 2012) (*quoting U.S. ex rel. England v. Los Angeles County*, 235 F.R.D. 675, 684 (E.D. Cal. 2006)); *see also King v. Biter*, No. 115CV00414LJOSABPC, 2018 WL 339052, at *6 (E.D. Cal. Jan. 9, 2018).

Subject to and without waiving these general and specific objections, Plaintiff admits discovery is ongoing. Plaintiff further admits that Plaintiff has produced non-privileged documents in Plaintiff’s possession, custody, or control, responsive to Meta’s requests for production regarding licensing agreements for Plaintiff’s Asserted Works. Plaintiff otherwise denies this Request.

Dated: November 18, 2024

Respectfully submitted,

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By: /s/ Rachel Geman

Rachel Geman

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Case No. 4:23-cv-06663

**PLAINTIFF CHRISTOPHER GOLDEN'S
RESPONSES TO DEFENDANT META
PLATFORMS, INC.'S SECOND SET OF
REQUESTS FOR ADMISSION**

REQUEST FOR ADMISSION NO. 23:

Admit that YOU are personally unaware of any documentary evidence demonstrating that any PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

RESPONSE TO REQUEST NO. 23:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Christopher Golden. Plaintiff also objects to the term “documentary evidence” as being vague and overbroad because it is not limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds, admit.

REQUEST FOR ADMISSION NO. 24:

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

RESPONSE TO REQUEST NO. 24:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Christopher Golden. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds, admit.

REQUEST FOR ADMISSION NO. 25:

Admit that YOU have personally used one of Meta’s Llama models.

RESPONSE TO REQUEST NO. 25:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not

relevant to any claims or defenses in this dispute since this case concerns Meta’s large language models.

Plaintiff, in his individual capacity, responds, deny.

REQUEST FOR ADMISSION NO. 26:

Admit that YOU have personally used one of the ChatGPT large language models.

RESPONSE TO REQUEST NO. 26:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Christopher Golden. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff, in his individual capacity, responds, deny.

REQUEST FOR ADMISSION NO. 27:

Admit that each of YOUR ASSERTED WORKS have been made public.

RESPONSE TO REQUEST NO. 27:

Plaintiff objects to the defined term “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the term “Your” as referring to Plaintiff Christopher Golden. Plaintiff further objects to the phrase “made public” as vague and misleading; that a work is available publicly does not mean that it is free to use without any consideration. Plaintiff admits that his Asserted Works have been made available to the public through various licensing agreements that made copies of the Asserted Works available for a price. Plaintiff refers Meta to Plaintiff Golden’s response to RFP 12.

REQUEST FOR ADMISSION NO. 28:

Admit that each of YOUR ASSERTED WORKS had been made public prior to the infringement alleged in the COMPLAINT.

terms “You” and “Your” as referring to Plaintiff Christopher Golden. Plaintiff further objects to the phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections, Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained by him is insufficient to enable him to admit or deny.

Dated: July 22, 2024

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Case No. 4:23-cv-04663

**PLAINTIFF ANDREW SEAN GREER'S
RESPONSES TO DEFENDANT META
PLATFORMS, INC.'S SECOND SET OF
REQUESTS FOR ADMISSION**

1 Admit that YOU are personally unaware of any documentary evidence demonstrating that any
2 PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR
3 ASSERTED WORKS.

4 **RESPONSE TO REQUEST NO. 23:**

5 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
7 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the
8 terms “You” and “Your” as referring to Plaintiff Andrew Sean Greer. Plaintiff also objects to the term
9 “documentary evidence” as being vague and overbroad because it is not limited to the specific claims
10 and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware”
11 as unintelligible. Plaintiff, in him individual capacity, responds, admit.

12 **REQUEST FOR ADMISSION NO. 24:**

13 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models
14 that infringes YOUR ASSERTED WORKS.

15 **RESPONSE TO REQUEST NO. 24:**

16 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
17 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
18 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the
19 terms “You” and “Your” as referring to Plaintiff Andrew Sean Greer. Plaintiff objects to the phrase
20 “personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds, admit.

21 **REQUEST FOR ADMISSION NO. 25:**

22 Admit that YOU have personally used one of Meta’s Llama models.

23 **RESPONSE TO REQUEST NO. 25:**

24 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
25 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
26 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the
27 phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not
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1 relevant to any claims or defenses in this dispute since this case concerns Meta’s large language
2 models. Plaintiff, in him individual capacity, responds, deny.

3 **REQUEST FOR ADMISSION NO. 26:**

4 Admit that YOU have personally used one of the ChatGPT large language models.

5 **RESPONSE TO REQUEST NO. 26:**

6 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
7 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
8 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the
9 terms “You” and “Your” as referring to Plaintiff Andrew Sean Greer. Plaintiff objects to the phrase
10 “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to
11 any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff,
12 in him individual capacity, responds, deny.

13 **REQUEST FOR ADMISSION NO. 27:**

14 Admit that each of YOUR ASSERTED WORKS have been made public.

15 **RESPONSE TO REQUEST NO. 27:**

16 Plaintiff objects to the defined term “Your” as vague and overbroad and calling for discovery
17 that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any
18 person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the term “Your” as
19 referring to Plaintiff Andrew Sean Greer. Plaintiff further objects to the phrase “made public” as vague
20 and misleading; that a work is available publicly does not mean that it is free to use without any
21 consideration. Plaintiff admits that him Asserted Works have been made available to the public through
22 various licensing agreements that made copies of the Asserted Works available for a price. Plaintiff
23 refers Meta to Plaintiff Silverman’s response to RFP 12.

24 **REQUEST FOR ADMISSION NO. 28:**

25 Admit that each of YOUR ASSERTED WORKS had been made public prior to the
26 infringement alleged in the COMPLAINT.

1 terms “You” and “Your” as referring to Plaintiff Andrew Sean Greer. Plaintiff further objects to the
2 phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections,
3 Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained
4 by him is insufficient to enable him to admit or deny.

5 Dated: July 22, 2024

By: /s/ Bryan Clobes
Bryan L. Clobes

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Case No. 4:23-cv-04663

**PLAINTIFF DAVID HENRY HWANG'S
RESPONSES TO DEFENDANT META
PLATFORMS, INC.'S SECOND SET OF
REQUESTS FOR ADMISSION**

1 Admit that YOU are personally unaware of any documentary evidence demonstrating that any
2 PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR
3 ASSERTED WORKS.

4 **RESPONSE TO REQUEST NO. 23:**

5 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
7 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the
8 terms “You” and “Your” as referring to Plaintiff David Henry Hwang. Plaintiff also objects to the term
9 “documentary evidence” as being vague and overbroad because it is not limited to the specific claims
10 and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware”
11 as unintelligible. Plaintiff, in him individual capacity, responds, admit.

12 **REQUEST FOR ADMISSION NO. 24:**

13 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models
14 that infringes YOUR ASSERTED WORKS.

15 **RESPONSE TO REQUEST NO. 24:**

16 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
17 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
18 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the
19 terms “You” and “Your” as referring to Plaintiff David Henry Hwang. Plaintiff objects to the phrase
20 “personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds, admit.

21 **REQUEST FOR ADMISSION NO. 25:**

22 Admit that YOU have personally used one of Meta’s Llama models.

23 **RESPONSE TO REQUEST NO. 25:**

24 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
25 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
26 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the
27 phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not
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1 relevant to any claims or defenses in this dispute since this case concerns Meta’s large language
2 models. Plaintiff, in him individual capacity, responds, deny.

3 **REQUEST FOR ADMISSION NO. 26:**

4 Admit that YOU have personally used one of the ChatGPT large language models.

5 **RESPONSE TO REQUEST NO. 26:**

6 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
7 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
8 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the
9 terms “You” and “Your” as referring to Plaintiff David Henry Hwang. Plaintiff objects to the phrase
10 “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to
11 any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff,
12 in him individual capacity, responds, deny.

13 **REQUEST FOR ADMISSION NO. 27:**

14 Admit that each of YOUR ASSERTED WORKS have been made public.

15 **RESPONSE TO REQUEST NO. 27:**

16 Plaintiff objects to the defined term “Your” as vague and overbroad and calling for discovery
17 that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any
18 person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the term “Your” as
19 referring to Plaintiff David Henry Hwang. Plaintiff further objects to the phrase “made public” as
20 vague and misleading; that a work is available publicly does not mean that it is free to use without any
21 consideration. Plaintiff admits that him Asserted Works have been made available to the public through
22 various licensing agreements that made copies of the Asserted Works available for a price. Plaintiff
23 refers Meta to Plaintiff Silverman’s response to RFP 12.

24 **REQUEST FOR ADMISSION NO. 28:**

25 Admit that each of YOUR ASSERTED WORKS had been made public prior to the
26 infringement alleged in the COMPLAINT.

1 terms “You” and “Your” as referring to Plaintiff David Henry Hwang. Plaintiff further objects to the
2 phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections,
3 Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained
4 by him is insufficient to enable him to admit or deny.

5 Dated: July 22, 2024

By: /s/ Bryan L. Clobes
Bryan L. Clobes

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Case No. 4:23-cv-06663

**PLAINTIFF RICHARD KADREY'S
RESPONSES TO DEFENDANT META
PLATFORMS, INC.'S SECOND SET OF
REQUESTS FOR ADMISSION**

REQUEST FOR ADMISSION NO. 23:

Admit that YOU are personally unaware of any documentary evidence demonstrating that any PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

RESPONSE TO REQUEST NO. 23:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Richard Kadrey. Plaintiff also objects to the term “documentary evidence” as being vague and overbroad because it is not limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds, admit.

REQUEST FOR ADMISSION NO. 24:

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

RESPONSE TO REQUEST NO. 24:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Richard Kadrey. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds, admit.

REQUEST FOR ADMISSION NO. 25:

Admit that YOU have personally used one of Meta’s Llama models.

RESPONSE TO REQUEST NO. 25:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not

relevant to any claims or defenses in this dispute since this case concerns Meta’s large language models.

Plaintiff, in his individual capacity, responds, deny.

REQUEST FOR ADMISSION NO. 26:

Admit that YOU have personally used one of the ChatGPT large language models.

RESPONSE TO REQUEST NO. 26:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Richard Kadrey. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff, in his individual capacity, responds, deny.

REQUEST FOR ADMISSION NO. 27:

Admit that each of YOUR ASSERTED WORKS have been made public.

RESPONSE TO REQUEST NO. 27:

Plaintiff objects to the defined term “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the term “Your” as referring to Plaintiff Richard Kadrey. Plaintiff further objects to the phrase “made public” as vague and misleading; that a work is available publicly does not mean that it is free to use without any consideration. Plaintiff admits that his Asserted Works have been made available to the public through various licensing agreements that made copies of the Asserted Works available for a price. Plaintiff refers Meta to Plaintiff Kadrey’s response to RFP 12.

REQUEST FOR ADMISSION NO. 28:

Admit that each of YOUR ASSERTED WORKS had been made public prior to the infringement alleged in the COMPLAINT.

terms “You” and “Your” as referring to Plaintiff Richard Kadrey. Plaintiff further objects to the phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections, Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained by him is insufficient to enable him to admit or deny.

Dated: July 22, 2024

By: /s/ Joseph R. Saveri
Joseph R. Saveri

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,
Individual and Representative Plaintiffs,
v.
Meta Platforms, Inc.,
Defendant.

Lead Case No. 3:23-cv-03417-VC
Case No. 4:23-cv-04663

**PLAINTIFF LAURA LIPPMAN'S
RESPONSES TO DEFENDANT META
PLATFORMS, INC.'S SECOND SET OF
REQUESTS FOR ADMISSION**

RESPONSE TO REQUEST NO. 23:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Laura Lippman. Plaintiff also objects to the term “documentary evidence” as being vague and overbroad because it is not limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

REQUEST FOR ADMISSION NO. 24:

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

RESPONSE TO REQUEST NO. 24:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Laura Lippman. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

REQUEST FOR ADMISSION NO. 25:

Admit that YOU have personally used one of Meta’s Llama models.

RESPONSE TO REQUEST NO. 25:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff, in her individual capacity, responds, deny.

REQUEST FOR ADMISSION NO. 26:

Admit that YOU have personally used one of the ChatGPT large language models.

1 Dated: July 22, 2024

By: /s/ Bryan Clobes
Bryan L. Clobes

3 Bryan L. Clobes (pro hac vice)
4 Alexander J. Sweatman (pro hac vice)
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Case No. 4:23-cv-06663

**PLAINTIFF SARAH SILVERMAN'S
RESPONSES TO DEFENDANT META
PLATFORMS, INC.'S SECOND SET OF
REQUESTS FOR ADMISSION**

REQUEST FOR ADMISSION NO. 23:

Admit that YOU are personally unaware of any documentary evidence demonstrating that any PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

RESPONSE TO REQUEST NO. 23:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Sarah Silverman. Plaintiff also objects to the term “documentary evidence” as being vague and overbroad because it is not limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

REQUEST FOR ADMISSION NO. 24:

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

RESPONSE TO REQUEST NO. 24:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Sarah Silverman. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

REQUEST FOR ADMISSION NO. 25:

Admit that YOU have personally used one of Meta’s Llama models.

RESPONSE TO REQUEST NO. 25:

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not

1 relevant to any claims or defenses in this dispute since this case concerns Meta’s large language models.

2 Plaintiff, in her individual capacity, responds, deny.

3 **REQUEST FOR ADMISSION NO. 26:**

4 Admit that YOU have personally used one of the ChatGPT large language models.

5 **RESPONSE TO REQUEST NO. 26:**

6 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
7 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
8 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the
9 terms “You” and “Your” as referring to Plaintiff Sarah Silverman. Plaintiff objects to the phrase
10 “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to
11 any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff,
12 in her individual capacity, responds, deny.

13 **REQUEST FOR ADMISSION NO. 27:**

14 Admit that each of YOUR ASSERTED WORKS have been made public.

15 **RESPONSE TO REQUEST NO. 27:**

16 Plaintiff objects to the defined term “Your” as vague and overbroad and calling for discovery
17 that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any
18 person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the term “Your” as
19 referring to Plaintiff Sarah Silverman. Plaintiff further objects to the phrase “made public” as vague
20 and misleading; that a work is available publicly does not mean that it is free to use without any
21 consideration. Plaintiff admits that her Asserted Works have been made available to the public through
22 various licensing agreements that made copies of the Asserted Works available for a price. Plaintiff
23 refers Meta to Plaintiff Silverman’s response to RFP 12.

24 **REQUEST FOR ADMISSION NO. 28:**

25 Admit that each of YOUR ASSERTED WORKS had been made public prior to the
26 infringement alleged in the COMPLAINT.

terms “You” and “Your” as referring to Plaintiff Sarah Silverman. Plaintiff further objects to the phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections, Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained by her is insufficient to enable her to admit or deny.

Dated: July 22, 2024

By: /s/ Joseph R. Saveri
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Case No. 4:23-cv-04663

**PLAINTIFF RACHEL LOUISE SNYDER'S
RESPONSES TO DEFENDANT META
PLATFORMS, INC.'S SECOND SET OF
REQUESTS FOR ADMISSION**

1 Admit that YOU are personally unaware of any documentary evidence demonstrating that any
2 PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR
3 ASSERTED WORKS.

4 **RESPONSE TO REQUEST NO. 23:**

5 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
7 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the
8 terms “You” and “Your” as referring to Plaintiff Rachel Louise Snyder. Plaintiff also objects to the
9 term “documentary evidence” as being vague and overbroad because it is not limited to the specific
10 claims and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally
11 unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

12 **REQUEST FOR ADMISSION NO. 24:**

13 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models
14 that infringes YOUR ASSERTED WORKS.

15 **RESPONSE TO REQUEST NO. 24:**

16 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
17 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
18 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the
19 terms “You” and “Your” as referring to Plaintiff Rachel Louise Snyder. Plaintiff objects to the phrase
20 “personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

21 **REQUEST FOR ADMISSION NO. 25:**

22 Admit that YOU have personally used one of Meta’s Llama models.

23 **RESPONSE TO REQUEST NO. 25:**

24 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
25 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
26 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the
27 phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not
28

1 relevant to any claims or defenses in this dispute since this case concerns Meta’s large language
2 models. Plaintiff, in her individual capacity, responds, deny.

3 **REQUEST FOR ADMISSION NO. 26:**

4 Admit that YOU have personally used one of the ChatGPT large language models.

5 **RESPONSE TO REQUEST NO. 26:**

6 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
7 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
8 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the
9 terms “You” and “Your” as referring to Plaintiff Rachel Louise Snyder. Plaintiff objects to the phrase
10 “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to
11 any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff,
12 in her individual capacity, responds, deny.

13 **REQUEST FOR ADMISSION NO. 27:**

14 Admit that each of YOUR ASSERTED WORKS have been made public.

15 **RESPONSE TO REQUEST NO. 27:**

16 Plaintiff objects to the defined term “Your” as vague and overbroad and calling for discovery
17 that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any
18 person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the term “Your” as
19 referring to Plaintiff Rachel Louise Snyder. Plaintiff further objects to the phrase “made public” as
20 vague and misleading; that a work is available publicly does not mean that it is free to use without any
21 consideration. Plaintiff admits that her Asserted Works have been made available to the public through
22 various licensing agreements that made copies of the Asserted Works available for a price. Plaintiff
23 refers Meta to Plaintiff Silverman’s response to RFP 12.

24 **REQUEST FOR ADMISSION NO. 28:**

25 Admit that each of YOUR ASSERTED WORKS had been made public prior to the
26 infringement alleged in the COMPLAINT.

1 terms “You” and “Your” as referring to Plaintiff Rachel Louise Snyder. Plaintiff further objects to the
2 phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections,
3 Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained
4 by her is insufficient to enable her to admit or deny.

5 Dated: July 22, 2024

By: /s/ Bryan Clobes
Bryan L. Clobes

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

RICHARD KADREY, SARAH SILVERMAN,
CHRISTOPHER GOLDEN, TA-NEHISI
COATES, JUNOT DÍAZ, ANDREW SEAN
GREER, DAVID HENRY HWANG,
MATTHEW KLAM, LAURA LIPPMAN,
RACHEL LOUISE SNYDER, JACQUELINE
WOODSON, AND LYSA TERKEURST,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.;

Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFF LYSA TERKEURST'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS,
INC.'S SECOND SET OF REQUESTS
FOR ADMISSION**

Plaintiff Lysa TerKeurst ("Plaintiff") hereby responds to Defendant Meta Platforms, Inc.'s ("Defendant" or "Meta") Second Set of Requests for Admissions (the "Requests" or "RFAs").

GENERAL OBJECTIONS

1. Plaintiff generally objects to Defendant's definitions and instructions to the extent they purport to require Plaintiff to respond in any way beyond what is required by the Federal and local rules.

2. Plaintiff objects to the Requests to the extent they seek information or materials that are protected from disclosure by attorney-client privilege, the work-product doctrine, expert

1 limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the
2 phrase “you are personally unaware” as unintelligible. Subject to and without waiving these
3 objections, Plaintiff admits that she is currently personally unaware of any documentary
4 evidence demonstrating that a PERSON read text generated by any of Meta’s Llama models as a
5 substitute for reading any of Plaintiff’s ASSERTED WORKS but denies that Plaintiff’s lack of
6 awareness has any bearing on whether such conduct occurred or whether documentary evidence
7 of such conduct exists. Plaintiff otherwise denies Request No. 23.

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9
10 **REQUEST FOR ADMISSION NO. 24:**

11 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama
12 models that infringes YOUR ASSERTED WORKS.

13 **RESPONSE TO REQUEST NO. 24:**

14 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and
15 calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as
16 defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff
17 will construe the terms “You” and “Your” as referring to Plaintiff Lysa TerKeurst. Plaintiff
18 objects to the phrase “personally unaware” as unintelligible. Subject to and without waiving
19 these objections, Plaintiff denies Request No. 24.

20 **REQUEST FOR ADMISSION NO. 25:**

21 Admit that YOU have personally used one of Meta’s Llama models.

22 **RESPONSE TO REQUEST NO. 25:**

23 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and
24 calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as
25 defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff
26 will construe the terms “You” and “Your” as referring to Plaintiff Lysa TerKeurst. Plaintiff

1 further objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further
2 objects to this Request as not relevant to any claims or defenses in this dispute since this case
3 concerns Meta’s conduct in connection with Meta’s large language models. Subject to and
4 without waiving these objections, Plaintiff denies Request No. 25.

5 **REQUEST FOR ADMISSION NO. 26:**

6 Admit that YOU have personally used one of the ChatGPT large language models.

7 **RESPONSE TO REQUEST NO. 26:**

8 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and
9 calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as
10 defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff
11 will construe the terms “You” and “Your” as referring to Plaintiff Lysa TerKeurst. Plaintiff
12 objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to
13 this Request as not relevant to any claims or defenses in this dispute since this case concerns
14 Meta’s conduct in connection with Meta’s large language models. Subject to and without
15 waiving these objections, Plaintiff denies Request No. 26.

16 **REQUEST FOR ADMISSION NO. 27:**

17 Admit that each of YOUR ASSERTED WORKS have been made public.

18 **RESPONSE TO REQUEST NO. 27:**

19 Plaintiff objects to the defined term “Your” as vague and overbroad and calling for
20 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
21 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe
22 the term “Your” as referring to Plaintiff Lysa TerKeurst. Plaintiff further objects to the phrase
23 “made public” as vague and misleading; that a work is available publicly does not mean that it is
24 free to use without any consideration. Subject to and without waiving these objections, Plaintiff
25 admits Request No. 27 to the extent that her Asserted Works have been made available to the

1
2 Dated: August 21, 2024

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Case No. 4:23-cv-04663

**PLAINTIFF JACQUELINE WOODSON'S
RESPONSES TO DEFENDANT META
PLATFORMS, INC.'S SECOND SET OF
REQUESTS FOR ADMISSION**

1 Admit that YOU are personally unaware of any documentary evidence demonstrating that any
2 PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR
3 ASSERTED WORKS.

4 **RESPONSE TO REQUEST NO. 23:**

5 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
7 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the
8 terms “You” and “Your” as referring to Plaintiff Jacqueline Woodson. Plaintiff also objects to the term
9 “documentary evidence” as being vague and overbroad because it is not limited to the specific claims
10 and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware”
11 as unintelligible. Plaintiff, in her individual capacity, responds, admit.

12 **REQUEST FOR ADMISSION NO. 24:**

13 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models
14 that infringes YOUR ASSERTED WORKS.

15 **RESPONSE TO REQUEST NO. 24:**

16 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
17 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
18 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the
19 terms “You” and “Your” as referring to Plaintiff Jacqueline Woodson. Plaintiff objects to the phrase
20 “personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

21 **REQUEST FOR ADMISSION NO. 25:**

22 Admit that YOU have personally used one of Meta’s Llama models.

23 **RESPONSE TO REQUEST NO. 25:**

24 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
25 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
26 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the
27 phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not
28

1 relevant to any claims or defenses in this dispute since this case concerns Meta’s large language
2 models. Plaintiff, in her individual capacity, responds, deny.

3 **REQUEST FOR ADMISSION NO. 26:**

4 Admit that YOU have personally used one of the ChatGPT large language models.

5 **RESPONSE TO REQUEST NO. 26:**

6 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for
7 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it
8 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the
9 terms “You” and “Your” as referring to Plaintiff Jacqueline Woodson. Plaintiff objects to the phrase
10 “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to
11 any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff,
12 in her individual capacity, responds, deny.

13 **REQUEST FOR ADMISSION NO. 27:**

14 Admit that each of YOUR ASSERTED WORKS have been made public.

15 **RESPONSE TO REQUEST NO. 27:**

16 Plaintiff objects to the defined term “Your” as vague and overbroad and calling for discovery
17 that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any
18 person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the term “Your” as
19 referring to Plaintiff Jacqueline Woodson. Plaintiff further objects to the phrase “made public” as vague
20 and misleading; that a work is available publicly does not mean that it is free to use without any
21 consideration. Plaintiff admits that her Asserted Works have been made available to the public through
22 various licensing agreements that made copies of the Asserted Works available for a price. Plaintiff
23 refers Meta to Plaintiff Silverman’s response to RFP 12.

24 **REQUEST FOR ADMISSION NO. 28:**

25 Admit that each of YOUR ASSERTED WORKS had been made public prior to the
26 infringement alleged in the COMPLAINT.

1 terms “You” and “Your” as referring to Plaintiff Jacqueline Woodson. Plaintiff further objects to the
2 phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections,
3 Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained
4 by her is insufficient to enable her to admit or deny.

5 Dated: July 22, 2024

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Bryan L. Clobes

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